

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

1.	AMY DAVIS,)	
)	
	Plaintiff,)	
)	Case No. 16-CIV-554-HE
vs.)	
)	
)	
1.	AMERICAN FAMILY LIFE)	
	ASSURANCE COMPANY OF)	
	COLUMBUS d/b/a AFLAC,)	
)	
	Defendant.)	

JOINT MOTION FOR AGREED PROTECTIVE ORDER

COME NOW Plaintiff, Amy Davis (“Plaintiff”) and Defendant, American Family Life Assurance Company of Columbus d/b/a AFLAC (“Defendant”), collectively identified herein as (“Parties”), by and through counsel, and respectfully request this Honorable Court enter the proposed Agreed Protective Order, attached hereto as Exhibit

1. In support of this Joint Motion, the Parties state as follows:

1. The Parties would show the Court that in this action they have, or will pursuant to request, produce in discovery documents which contain confidential and/or proprietary information, as well as potentially confidential personal information. Accordingly, a Protective Order is necessary to preserve the privacy of any such information.

2. This Joint Motion is submitted jointly, thereby signifying the Parties agree on the relief requested herein, and the proposed Agreed Protective Order submitted herewith.

3. The Parties believe this Joint Motion and the proposed Agreed Protective Order are made in compliance with the Court's instructions and guidelines regarding the same.

WHEREFORE, premises considered, the Parties respectfully request this Court enter the proposed Agreed Protective Order submitted contemporaneously herewith.

DATED this 24th day of August, 2016.

Respectfully submitted,

s/Amy Wellington

(signed by Filing Attorney with
Permission of Attorney)
Simone Gosnell Fulmer, OBA #17037
Jacob L. Rowe, OBA #21797
Harrison C. Lujan, OBA #30154
Amy Wellington, OBA #9467
Fulmer Group, PLLC
P.O. Box 2448
1101 N. Broadway Ave., Suite 102
Oklahoma City, OK 73101
Phone/Fax: (405) 510-0077
sfulmer@fulmergrouplaw.com
jrowe@fulmergrouplaw.com
hlujan@fulmergrouplaw.com
awellington@fulmergrouplaw.com
Attorneys for Plaintiff

s/Jessica L. Johnson

Sean H. McKee, OBA #14277
smckee@bestsharp.com
Jessica L. Johnson, OBA #31851
jjohnson@bestsharp.com
BEST & SHARP
Williams Center Tower I
One West Third Street, Suite 900
Tulsa, OK 74103
Telephone: (918) 582-1234
Facsimile: (918) 585-9447
Attorneys for Defendant